UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

PEGGY YOUNG)
Plaintiff,)
v.) Civil Action No.: DKC 08 CV 2586
UNITED PARCEL SERVICE, INC.,)
Defendants.)

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Plaintiff Peggy Young hereby opposes the motion for summary judgment (Doc. 60)¹ filed July 30, 2010, by Defendant United Parcel Service, Inc. (UPS), on the grounds that there are many genuine issues of material fact, and UPS is not entitled to judgment as a matter of law. In support of her opposition Plaintiff relies on the following:

- 1. The pleadings--*i.e.*, Plaintiff's "First Amended Complaint" filed October 29, 2008 ("Compl.", Doc. 4), and "Defendant's Answer to First Amended Complaint" filed December 8, 2008 ("Ans.", Doc. 7);
- 2. Various documents from among Defendant UPS's motion papers, including its supporting memorandum ("UPS Mem.", Doc. 60-1);
 - 3. Plaintiff's memorandum submitted herewith ("P. Mem."); and

¹Citations in these papers to "Doc." are to the document numbers as assigned to filings in the Court's docketing record.

4. The statements ("Stmt."), deposition transcripts ("Dep."), and Plaintiff's Exhibits ("PX") cited in Plaintiff's memorandum and submitted herewith.

WHEREFORE, the Court should deny Defendant UPS's motion for summary judgment and should schedule this case for trial.

Respectfully submitted,

/s/

Sharon Fast Gustafson 4041 North 21st Street Arlington, Virginia 22207-3040 (703) 527-0147 telephone (703) 527-0582 telefacsimile Federal Bar No. 16485 sf.gustafson@verizon.net

Attorney for Plaintiff